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February 24, 2012

VIA ECF

Magistrate Judge Lois Bloom
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Shirley Wrubel, as Trustee of the Sara Hollander Irrevocable Life
Insurance Trust v. John Hancock Life Insurance Company,*
Docket No. 11-cv-01873 (WFK)(LB)

Dear Magistrate Judge Bloom:

This firm represents the Defendant John Hancock Life Insurance Company (U.S.A.) ("John Hancock"). We write at the direction of Your law clerk, Mr. Michael D. Truilli, to advise you of the status of the discovery issues raised by our letter dated February 17, 2012 and plaintiff's letter dated February 22, 2012.

Yesterday, the parties appeared before United States District Court Judge William F. Kuntz for a pre-motion conference concerning John Hancock's request to amend its answer. During this conference, Judge Kuntz granted John Hancock's request for fifteen (15) depositions. In addition, Judge Kuntz extended discovery from March 30, 2012 to June 1, 2012.

With regard to the non-party discovery relief John Hancock sought in its February 17, 2012 letter to Your Honor, since filing the letter, John Hancock has been able to serve its non-party subpoenas via personal service on Protective Services and Azras Yisorel, Inc. Accordingly, there is no need for the Court to respond to our request to serve by mail. The depositions of non-party witnesses Mordechai Rubin and B&M Resort LLC remain scheduled for Tuesday, February 28 and Friday March 2, respectively. If these witnesses fail to comply with the subpoena duces tecum or appear for their depositions, John Hancock will then seek the Court's assistance with compelling their production of documents and their depositions.

In light of the foregoing the parties do not believe that a conference on Monday before Your Honor is necessary, because the matters raised in our letter and Plaintiff's response to those matters have been resolved.

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The parties are currently working to resolve additional discovery issues and, will notify the Court by letter if those issues cannot be resolved. Thank you for Your consideration in this matter.

Respectfully submitted,

/s/ Neil Merkl

Neil Merkl

cc: David BenHaim, Esq. (via ECF)